UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE LEAGUE PLAYERS' CONCUSSION) No. 12-md-2323 (AB)
INJURY LITIGATION)) MDL No. 2323
	SHORT FORM COMPLAINT
THIS DOCUMENT RELATES TO:	IN RE: NATIONAL FOOTBALL
73. 1. 160. No. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	LEAGUE PLAYERS' CONCUSSION
Plaintiff's Master Administrative Long Form Complaint v. National Football) INJURY LITIGATION)
League [et al.],	JURY TRIAL DEMANDED
Davis et al v. National Football League))
3: 12-cv-01864	1

SHORT FORM COMPLAINT

- 1. Plaintiffs, Stephen Davis and his wife Deedee Davis bring this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.
- 2. Plaintiffs are filing this short form complaint as required by this Court's Case Management Order No. 2, filed April 26, 2012.
- 3. Plaintiffs incorporate by reference the allegations (as designated below) of the Master Administrative Long Form Complaint, as may be amended, as if fully set forth at length in this Short Form Complaint.
- 4. Plaintiffs, Stephen and Deedee Davis, are residents and citizens of the state of South Carolina, and they claim the damages set forth below.
- 5. Plaintiff's spouse, Deedee Davis, is a resident and citizen of South Carolina, and claims damages as a result of loss of consortium proximately caused by the harm suffered by her Plaintiff husband.

6. On information and belief, Plaintiff Stephen Davis sustained repetitive, traumatic sub-concussive and concussive head impacts during NFL games and practices. On information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and concussive impacts the Plaintiff sustained during NFL games and practices. On information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

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contir	nue to c	levelop over time.
	7.	Plaintiffs claim damages as a result of:
		_x Injury to Himself
		_xEconomic Loss
		_xLoss of services
	8.	As a result of injuries to her husband, Stephen Davis, Plaintiff's
spous	e, Deed	dee Davis, suffers from a loss of consortium, including that following
injurie	es:	
	 	_x loss of marital services;
		_xloss of companionship;
		_x loss of support
		_xmonetary losses in the form of unreimbursed costs she has had
to expend for the health care and personal care of her husband.		
		<u>DEFENDANTS</u>
	9.	Plaintiff brings this case against the following Defendant in this action:
		_xNational Football League
		_xNFL Properties, LLC

10. Plaintiff played in the National Football League for the following: teams: Washington Redskins, Carolina Panthers and St. Louis Rams.

CAUSES OF ACTION

	11.	Plaintiff herein adopts by reference the following Counts of the Master
Admir	nistrativ	ve Long-Form Complaint, along with the factual allegations incorporated by
refere	nce in	those Counts:
		xCount I (Action for declaratory relief – liability against the NFL)
		_xCount II (Medical Monitoring against the NFL)
		_xCount IV (Fraudulent Concealment against the NFL)
		xCount V (Fraud against the NFL)
		_xCount VI (Negligent misrepresentation against the NFL)
		_xCount X (Negligence post 1994 against the NFL)
		_xCount XI (Loss of Consortium against the NFL)
		_xCount XII (Negligent Hiring against the NFL)
		_xCount XIII (Negligent Retention against the NFL)
		xCount XVIII (Civil Conspiracy/Fraudulent Concealment against the
		NFL)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. For punitive and exemplary damages as applicable;
- C. For all applicable statutory damages of the state whose law will govern this action;
- D. For medical monitoring, whether denominated as damages or in the form of equitable relief;
- E. For an award of attorney's fees and costs;
- F. An award of prejudgment interest and costs of suit; and
- G. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Rule 38, Federal Rules of Civil Procedure, Plaintiffs hereby demand a trial by jury.

RESPECTFULLY SUBMITTED:

_s/ Sol H. Weiss__

Sol H. Weiss

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s/ Pete Strom

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